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ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA, SOUTH CAROLINA

May 19, 2008

VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

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**Re: Electric Cooperatives of SC / SCE&G Rebate
Docket No. 2008-155-G
Our File No. 30106-0004**

Dear Mr. Terreni:

Enclosed for filing please find the Petition to Intervene of the Electric Cooperatives of South Carolina, Inc. in the above-referenced matter.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III, Esquire

FRE/lla

Enclosures

cc: Christopher R. Koon, General Counsel (via e-mail)
Shannon Hudson, ORS (via e-mail)
Chad K. Burgess, SCE&G (via e-mail)

STATE OF SOUTH CAROLINA

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

IN RE:

COVER SHEET

Petition of South Carolina Electric & Gas Company
for an accounting order authorizing the deferment
and amortization of expenditures made in connection
with its gas water heater rebate program.

DOCKET
NUMBER: 2008-155-G

(Please type or print)

Submitted by: Frank R. Ellerbe, IIISC Bar Number: 1866

Address: Robinson, McFadden & Moore, P.C.
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input checked="" type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigator	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2008- 155-G

In re)	
)	
Petition of South Carolina Electric & Gas)	PETITION TO INTERVENE
Company for an accounting order)	OF THE ELECTRIC COOPERATIVES
authorizing the deferment and amortization)	OF SOUTH CAROLINA, INC.
of expenditures made in connection with its)	
gas water heater rebate program)	
<hr/>)	

Pursuant to 26 S.C. Regs. 103-825, The SC Electric Cooperatives of South Carolina, Inc. ("ECSC") respectfully petitions the Public Service Commission of South Carolina ("Commission") for permission to intervene in the Petition of South Carolina Electric & Gas Company for an accounting order authorizing the deferment and amortization of expenditures made in connection with its gas water heater rebate program. In support of this petition, the ECSC would show the following:

1. ECSC is a corporation organized and existing under the laws of the State of South Carolina.
2. The authorized representatives of ECSC in this proceeding are as follows:

Mr. Christopher R. Koon
The Electric Cooperatives of South Carolina, Inc.
808 Knox Abbott Drive
Cayce, South Carolina 29033-3311

And

LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, PC
1901 Main Street, Suite 1200
Post Office Box 944
Columbia, South Carolina 29202
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3. SCE&G has filed a petition seeking an accounting order for regulatory accounting purposes authorizing SCE&G to increase the amount of its natural gas water heater rebate incentive offered to developers of new multi-family apartment projects.

4. ECSC has an interest in the above-captioned proceeding since many of its members provide electricity in the same areas where SCE&G supplies natural gas. Those ECSC members compete with SCE&G to provide energy to multi-family apartment projects. The increased rebate proposed by SCE&G in its petition is intended to persuade the owners of such projects to choose SCE&G to supply energy for hot water heating instead of the electricity sold by the electric cooperatives which are members of ECSC. ECSC and its members therefore have a direct and substantial interest in this proceeding.

5. ECSC's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. SCE&G should not be permitted to recover from its general body of subscribers a rebate that results in improper subsidization of its competition with the members of ECSC. SCE&G should be required to provide a detailed justification of the amount of its proposed rebate.

6. ECSC is informed and believes that granting its request to be made a party of record is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing the views and concerns of the ECSC can be developed. ECSC is aware that there was no notice published in connection with this filing, that SEC&G is not proposing to immediately recover anything from its ratepayers and that the Commission has already voted to approve the petition for an accounting order. Nevertheless, ECSC requests that it be allowed to intervene and that the Commission reconsider its approval of the petition. The requested accounting order is being sought as a preliminary step towards requiring the gas customers of SCE&G to pay for the rebate program. Questions about the propriety of the proposed program should be addressed immediately and allowing reconsideration at this point will not cause any prejudice to SCE&G.

7. ECSC estimates the time for its presentation to be approximately two hours and anticipates calling two witnesses.

WHEREFORE, ECSC prays for the following relief:

A. That this petition to intervene be granted by the Commission, that ECSC be made a formal party of record to the proceeding and that the Commission's vote to approve the petition be reconsidered.

B. That ECSC be allowed to fully participate in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as the Commission deems appropriate.

Dated this 19th day of May, 2008.

ROBINSON, MCFADDEN & MOORE, PC.



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Attorneys for The Electric Cooperatives of
South Carolina, Inc.

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-155-G**

IN RE:

Petition of South Carolina Electric &
Gas Company for an accounting
order authorizing the deferment
and amortization of expenditures
made in connection with its gas
water heater rebate program.

CERTIFICATE OF SERVICE

This is to certify that I, Leslie L. Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Petition to Intervene** in the foregoing matter by causing a copy of same to be placed in the United States Mail, postage prepaid, in an envelope addressed as follows:

Shannon Hudson
Office of Regulatory Staff
1441 Main Street, 3rd Floor
Columbia, SC 29211

Chad K. Burgess
South Carolina Electric & Gas Company
1426 Main Street, MC 130
Columbia, SC 29201

Dated at Columbia, South Carolina this 19th day of May, 2008.



Leslie L. Allen